

**Robbins Geller
Rudman & Dowd LLP**

Chicago Melville Nashville San Diego Wilmington
Boca Raton Manhattan Philadelphia San Francisco Washington, D.C.

April 15, 2024

VIA ECF

The Honorable Judge Margo K. Brodie
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Courtroom 6F
Brooklyn, NY 11201

Magistrate Judge Joseph A. Marutollo
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Courtroom N324
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*,
No. 1:05-MD-1720 (MKB)(JAM)

Dear Judges Brodie and Marutollo:

Rule 23(b)(3) Class Counsel (“Class Counsel”) attach as Exhibit A a funding request from Epiq regarding February and March 2024 activities as well as a request for pre-payment of the development, printing and mailing of a postcard reminder prior to the claims-filing deadline. The invoices total \$11,088,364.40. The invoices principally relates to printing and mailing the reminder postcard, staffing the toll-free number and email inbox to respond to class member questions, maintaining and updating the settlement website, conflict noticing efforts, data preparation and hosting efforts, and periodic reporting for counsel.

Class Counsel request that the Court approve the funding request of \$ 11,088,364.40. The requested funds should be paid from the Class Settlement Cash Escrow Account.

Respectfully submitted,

/s/ K. Craig Wildfang
K. Craig Wildfang
Thomas J. Undlin
Robins Kaplan LLP

/s/ H. Laddie Montague, Jr.
H. Laddie Montague, Jr.
Merrill G. Davidoff
Berger Montague PC

/s/ Alexandra S. Bernay
Patrick J. Coughlin
Alexandra S. Bernay
**Robbins Geller Rudman
& Dowd LLP**

Exhibit A

cc: All Counsel via ECF